

AO 91 (Rev. 11/11) Criminal Complaint

FILED

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America

v.

Asia Renee Hunt

Case No.

3:19mj-126

SHARON L. OVINGTON

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 2/28/2019 in the county of Montgomery in the
Southern District of Ohio, the defendant(s) violated:

Code Section

21 USC s. 846 & 841(b)(1)(A)

Offense Description

conspiracy to possess with intent to distribute 400 grams or more of fentanyl,
a Schedule II controlled substance

This criminal complaint is based on these facts:

See Attached Affidavit of Timothy Wallace

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence.

Date:

3-1-19

City and state:

Dayton, Ohio

Complainant's signature

Timothy Wallace, SA of HSI

Printed name and title

Judge's signature

Sharon L. Ovington, US Magistrate Judge

Printed name and title

ATTACHMENT "A"

AFFIDAVIT

1. I, Timothy Wallace, a Special Agent for United States Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), am hereinafter referred to as Affiant. As such, Affiant sets forth the following in support of an arrest warrant for Asia Renee HUNT.
2. I am an employee of Homeland Security Investigations assigned to the Cincinnati Resident Office. I have been a Special Agent with HSI since July 2009. I attended and graduated from the basic agent training course in Brunswick, Georgia and have received extensive training in the investigation of narcotics trafficking and financial crimes from Homeland Security Investigations, as well as ongoing in-service training.
3. Since February 2018, Affiant has been assigned to the HSI Border Enforcement Security Task Force (BEST) in Dayton, Ohio.
4. As a Special Agent for HSI, Affiant is charged with the duty of enforcing among other Titles, the Controlled Substance Act, Title 21, United States Code, together with other assigned duties as imposed by Federal law.
5. By virtue of Affiant's employment with HSI, he performs and has performed various tasks which include, but are not limited to:
 - a) Conducting surveillance for the primary purpose of observing the activities and movements of drug traffickers;
 - b) Functioning as a case agent which entails the supervision of specific aspects of drug investigations;

- c) The tracing and tracking of monies and assets gained by drug traffickers from the illegal sale of drugs.
- 6. This Affidavit is submitted in support of a criminal complaint, and seeks the issuance of an arrest warrant for Asia Renee HUNT (HUNT) for violation of 21 U.S.C. § 846 and 841(b)(1)(A) (conspiracy to possess with intent to distribute 400 grams or more of fentanyl).
- 7. The information contained in this Affidavit is largely based upon an investigation conducted by your Affiant and other law enforcement officers. All of the details of the investigation are not included in this Affidavit, rather only information necessary to establish probable cause of the aforementioned violations.

FACTS

FACTS SUPPORTING PROBABLE CAUSE

- 8. Unless otherwise noted, when I assert that a statement was made, I received the information from a law enforcement officer who provided the information to me, either verbally or in a written report. The officer providing me with the information may have received the information by way of personal knowledge or from another source.
- 9. On February 28, 2019, a Special Agent assigned to HSI BEST, comprised of Agents from federal, state and local police departments, received information from the HSI Long Beach Office that a female identified as Asia Renee HUNT, was scheduled to travel from Long Beach, CA, to Dayton, OH, via commercial aircraft. Furthermore, it was suspected that HUNT was transporting narcotics from Long Beach, CA, to Dayton, OH, concealed inside her checked luggage.


10. On that same date, HUNT traveled from Long Beach, CA, aboard American Airlines (AA) Flight 5805 to Phoenix, AZ. HUNT was scheduled to then travel from Phoenix, AZ, to Chicago, IL, and from Chicago, IL, to Dayton, OH, arriving at Dayton International Airport (DAY) aboard AA Flight 3983 at 5:15 p.m. A Special Agent from the HSI Long Beach Office confirmed HUNT boarded the flight at Long Beach Airport (LGB) as scheduled and had checked a navy blue roller bag at the LGB, prior to her departure. The Agent also provided Agents with a photograph obtained from video surveillance at LGB showing HUNT in possession of the navy blue roller bag prior to her departure at LGB.
11. After receiving the aforementioned information from HSI Long Beach, an HSI Task Force Officer obtained an anticipatory search warrant for HUNT's checked roller bag from the Montgomery County Court of Common Pleas.
12. At approximately 4:30 p.m., Your Affiant and Agents from HSI BEST subsequently arrived at the Dayton International Airport (DAY), in anticipation of HUNT's initial scheduled time of arrival of 5:15 p.m. A short time later, Agents learned that HUNT did not board her connecting flight from Phoenix, AZ, to Chicago, IL, and instead was now scheduled to travel from Phoenix, AZ, to Dayton, OH, via a connecting flight in Charlotte, NC. Agents also learned that HUNT's checked luggage had traveled from Phoenix, AZ, to Chicago, IL, as scheduled, and was due to arrive aboard AA 9313 at DAY approximately one hour prior to HUNT's arrival.
13. At approximately 8:15 p.m., Agents arrived at the baggage carousel area to await the arrival of HUNT's checked luggage. An Ohio State Highway Patrol (OSP) Trooper and his K-9 partner were also on-scene to assist.
14. At approximately 8:45 p.m., the AA baggage cart containing the luggage from AA Flight 9313 arrived at the baggage carousel. The Trooper subsequently deployed his K-9 partner to conduct a free sniff of the luggage once removed from the cart. The K-9 positively alerted to a navy blue roller bag for the presence of narcotic odor. Further review of the

bag revealed it contained an AA luggage tag affixed to it bearing the name Asia Renee HUNT. Additionally, the bag matched the bag depicted in the aforementioned photograph obtained from LGB surveillance video previously provided to Agents.

15. As a result of the positive K-9 alert, and pursuant to the anticipatory search warrant, Agents conducted a search of the navy blue roller bag, resulting in the discovery of a false bottom compartment inside the bag. Further inspection of the bag revealed two vacuum sealed packages taped together and wrapped in multiple layers of packaging material and oil. One of the vacuum sealed packages was found to contain a large quantity of blue circular tablets, and the other contained a chunky tan and black powdery substance.
16. Affiant conducted a field test of a blue circular tablet which returned a presumptive positive result for the presence of fentanyl. The weight of the package containing the tablets was determined to be approximately 1,000 grams.
17. Affiant also conducted a field test of the chunky tan and black powdery substance which returned a presumptive positive result for the presence of heroin. The weight of the package containing the chunky tan and black powdery substance was determined to be approximately 1,478 grams.
18. Agents removed the contraband from the false bottom compartment and re-packaged the compartment and contents of the luggage to appear as though it had not been accessed by law enforcement. Agents then returned the navy roller bag to the appropriate location, awaiting HUNT's arrival at DAY.
19. At approximately 11:01 p.m., HUNT arrived at DAY aboard AA Flight 5396. Agents conducted surveillance of HUNT as she traveled throughout the airport and arrived at the luggage carousel area. Agents observed HUNT as she then retrieved the navy roller bag, after which she exited the airport. HUNT then approached an airport taxi, placed the roller bag inside the trunk of the vehicle, and entered the taxi.

20. At approximately 11:25 p.m., HUNT departed DAY in the airport taxi. Agents maintained surveillance of the vehicle as it traveled to a Speedway Gas Station located in Miamisburg, OH. Agents observed HUNT as she exited the taxi, leaving her belongings in the vehicle, and entered the gas station for a short time and appeared to only speak with the clerk inside. HUNT then exited the gas station and was observed talking on her cell phone walking through the parking lot. A short time later, HUNT re-entered the airport taxi that was still parked in the lot, and Agents maintained surveillance as HUNT exited the area in that same vehicle. Agents maintained mobile surveillance as the taxi traveled north on Interstate 675 (I-675 N), continuing eastbound onto Interstate 70 (I-70 E).
21. As the taxi continued on I-70 E, passing State Route 72 (OH-72), Agents relayed the taxi's direction of travel to an Ohio State Highway Patrol (OSP) Trooper who was in the area assisting with surveillance. The Trooper pulled behind the vehicle and conducted a traffic stop east of the OH-72 exit on I-70 E.
22. Agents arrived on scene with the Trooper and took HUNT into custody. The Trooper subsequently advised Agents the taxi was destined for a hotel located in Dublin, OH.

Based on the facts set forth in the Affidavit, Your Affiant believes there is probable cause to issue a criminal complaint and arrest warrant against Asia Renee HUNT for violation of 21 U.S.C. § 846 and 841(b)(1)(A) (conspiracy to possess with intent to distribute 400 grams or more of fentanyl).


Timothy Wallace, Special Agent
Homeland Security Investigations

Subscribed and sworn to before me on March 1, 2019


Honorable Sharon L. Ovington
United States Magistrate Judge

